

**Comment Responses**  
**Pre-Final (95%) Remedial Design Report**  
**Operable Unit Two**  
**Radiation Technology, Inc. Superfund Site**  
**Rockaway Township, New Jersey**

**SAP Addendum Comments:**

**1. Section 3.8 Soil Removal Verification Sampling and Section 4.0 Analytical Protocol. Since these sections are addendum to the original SAP, the section numbering does not appear to be consistent with the original SAP. Please verify and reconcile.**

RESPONSE: The original SAP that was submitted in August of 2008 for the OU2 remedial investigation, titled: SAMPLING AND ANALYSIS PLAN, REMEDIAL INVESTIGATION/FEASIBILITY STUDY, RTI SUPERFUND SITE, ROCKAWAY TOWNSHIP, NEW JERSEY, consisted of sections numbered 1.0 through 7.0. The addendum to Section 3.0 is numbered subsection 3.8, which follows subsection 3.7 of the original SAP. The addenda to Section 4.0 are revisions of existing subsections 4.3 and 4.6. The numbering will stay the same, but the text of these subsections in the addendum has been revised to include the text from the original SAP and the additional text for the remediation verification sampling.

**2. This document included Sampling and Analysis Plan (SAP) and Quality Assurance Project Plan (QAPP) addenda, in which multiple references are provided, sometimes in the form of references within references. The scope of this work (soil excavation) is sufficiently different from the previous scope which mainly involved the groundwater matrix that that it would be preferable to submit a standalone document. Furthermore, if a QAPP is submitted using the UFP-QAPP guidance, it can be considered to be functionally equivalent to submitting a separate SAP and QAPP. Doing this will eliminate redundant information and minimize inconsistent information.**

RESPONSE: The original SAP and QAPP were prepared for the OU2 remedial investigation, which was primarily soil sampling, but also included surface water sampling. The original QAPP was prepared according to the guidance in place in 2008, when it was submitted. Since remediation verification sampling of soils for five metal analytes is the only sampling and lab analysis that will occur under the proposed remedial action, it is fitting to make minor modifications to the existing QAPP.

**QAPP Addendum Comments:**

**1. General Comment- The use of the UFP-QAPP worksheet format is recommended to ensure all the required QAPP information is addressed. Some of the comments provided below could have been easily addressed if the consistent use of UFP-QAPP worksheet format had been adopted to prepare the QAPP.**

RESPONSE: Comment noted. The original QAPP was prepared according to the guidance in place in 2008, when it was submitted. Since remediation verification sampling of soils for five

metal analytes is the only sampling and lab analysis that will occur under the proposed remedial action, it is fitting to make minor modifications to the existing QAPP.

**2. Section 2.2 QAPP Identifying Information-** The section referenced the original QAPP Worksheet #2 for the crosswalk. This should have been updated and resubmitted with the current QAPP.

RESPONSE: QAPP Worksheet #2, "QAPP Identifying Information", has been updated and added to the QAPP Addendum as Worksheet #2, Revision 1.

**3. Section 2.4.2 Communication Pathways-** The information provided did not include drivers that would necessitate communication between responsible entities. These drivers could be modifications to the scope of work, QAPP amendments, stop work order etc. The information should include the procedures that will be used to solicit concurrences and obtain approvals to modifications and resolving problems.

RESPONSE: Section 2.4.2 of the QAPP Addendum has been revised to include potential drivers and approval procedures.

**4. Special Training Requirements and Certification-** The information for this section was not updated. Since the work includes munitions and explosives of concern (MEC) screening, it appears that specialized training would be required to perform this type of work.

RESPONSE: Section 2.4.4 has been revised in the QAPP Addendum. The training requirements and certifications required for CRA field personnel and laboratory personnel are described in Section 2.4.4 of the original QAPP. The remediation contractor and MEC avoidance contractor (possibly the same company) will be responsible for compliance of their personnel with the applicable regulations. MEC avoidance personnel shall be trained technicians certified in MEC detection and avoidance procedures.

**5. Project planning information such as project quality objectives, project specific measurement criteria, ARARs or action limits, project scheduling and secondary data evaluation/usage should be included. Information related to the MEC screening should also be included. Please refer to UFP-QAPP Manual Sections 2.6 to 2.8 for additional information. UFP-QAPP Worksheets #10 to #16 should be used to document this information.**

RESPONSE: As referenced in Worksheet #2, project quality objectives, project specific measurement criteria, and secondary data evaluation/usage were presented in the following Sections of the original QAPP: Sections 2.6, 2.7, 2.8, and Worksheet #12.

The remediation verification performance standards are presented in Section 1.4 and Table 1.2 of the Remedial Design Report. The project schedule is presented in Section 5.0 and Figure 5.1 of the Remedial Design Report. Worksheet #2 has been updated to include these references.

MEC screening information is provided in Section 3.1.2, 3.2.1, and Appendix D of the Remedial Design Report. Worksheet #2 has been updated to include reference to the MEC information.

**6. The information related to the sampling tasks was not included with the addendum. They include the sampling design, sampling procedures, container requirements, required field equipment, field documentation procedures among others. Please see UFP-QAPP Manual Section 3.1. These should be documented using UFP-QAPP Worksheets # 17 to #22.**

RESPONSE: As referenced in Worksheet #2, the sampling design, sampling procedures, container requirements, required field equipment, and field documentation procedures are located as follows: SAP Section 3.0, Work Plan Sections 3.0 and 7.0, QAPP Tables 3.1, 3.2 and Table 3.4, Appendix A, Appendix B, and SAP Section 7.0.

**7. Section 3.3 Sampling Handling and Tracking System and Section 3.4 Sampling Handling- It is not clear if these two sections are replacing similarly numbered sections in the original QAPP. If they are, the information is not complete. There is no information on sample collection documentation, chain of custody requirements and the quality control sample requirements. Please verify and provide some clarifications.**

RESPONSE: These subsections were misnumbered in the QAPP Addendum. The correct subsection numbers are 3.3.2- SAMPLE HANDLING AND TRACKING SYSTEM and 3.3.2.1- SAMPLE HANDLING. These subsections are revisions to the original QAPP and only include the updated information necessary for the remediation verification sampling. The original QAPP provides all of the other requisite information, such as, sample collection documentation, chain of custody requirements and the quality control sample requirements. The Addendum has been revised to clarify this point.